

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

**IMPERIAL PETROLEUM RECOVERY
CORPORATION**

Debtor

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§
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§

CASE NO. 13-30466

Involuntary Chapter 7

RESPONSE TO INVOLUNTARY PETITION

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

IMPERIAL PETROLEUM RECOVERY CORPORATION (“Debtor”) hereby files this Response to the Involuntary Chapter 7 Bankruptcy Petition filed against it on January 31, 2013, and in support would show the following:

1. Debtor denies the allegations that Petitioners are eligible pursuant to 11 U.S.C. § 303(b) to file the involuntary petition. Any claims of alleged petitioning creditors that are not contingent or disputed would appear to be fully secured according to their claims in the state court.

2. Debtor admits that it is an entity against whom an order for relief may be entered under title 11 of the United States Code.

3. Debtor denies that it is generally not paying its debts as they become due, unless such debts are the subject of a bona fide dispute as to liability or amount.

4. Debtor asserts that the alleged claims of petitioning creditors are, all and each of them, the subject of bona fide disputes as to liability and amount. Alternatively, all such claims should be deemed contingent; and, appear to be fully secured. Most or all such claims of petitioning creditors are subject to a multitude of defenses and counterclaims.

5. Debtor reserves the right to amend and specifically plead additional matters, as well

as to seek to seek sanctions, including punitive damages pursuant to 11 U.S.C. § 303(i). Under the circumstances, Debtor believes that this involuntary petition has been filed in bad faith.

Wherefore, Debtor, Imperial Petroleum Recovery Corporation, prays that the involuntary petition be dismissed, and for such further relief as the Court deems just.

Date: March 12, 2013

/s/ **Leonard H. Simon**

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was served on March 12, 2013, by the CM/ECF system to all parties receiving electronic notice in this case and the each person and/or entity of the attached service list by U.S. First Class Mail, postage prepaid.

/s/ Leonard H. Simon

Label Matrix for local noticing
0541-4
Case 13-30466
Southern District of Texas
Houston
Sun Mar 10 15:58:38 CDT 2013

Imperial Petroleum Recovery Corporation
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End of Label Matrix
Mailable recipients 7
Bypassed recipients 5
Total 12